

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

R.S. BASSMAN, Derivatively on Behalf of FREDDIE MAC a/k/a Federal Home Loan Mortgage Corporation and its shareholders,

Plaintiff,

v.

RICHARD F. SYRON, PATRICIA L. COOK, ANTHONY PISZEL, EUGENE M. MCQUADE, RICHARD KARL GOELTZ, STEPHEN A. ROSS, SHAUN F. O'MALLEY, ROBERT R. GLAUBER, BARBARA T. ALEXANDER, WILLIAM M. LEWIS, JR., JEFFREY M. PEEK, GEOFFREY T. BOISI, RONALD F. POE, WASHINGTON MUTUAL, INC., PRICEWATERHOUSECOOPERS, LLP, KERRY K. KILLINGER, ANTHONY R. MERLO, JR., FIRST AMERICAN CORPORATION, FIRST AMERICAN EAPPRAISEIT, COUNTRYWIDE FINANCIAL CORPORATION, COUNTRYWIDE HOME EQUITY LOAN TRUST, COUNTRY-WIDE BANK, FSB, COUNTRYWIDE HOME LOANS, INC., LANDSAFE, INC., and ANGELO R. MOZILO,

Case No. 08-cv-2423-BSJ

Defendants,

- and -

FREDDIE MAC a/k/a Federal Home Loan Mortgage Corporation,

Nominal Defendant.

ESTHER SADOWSKY TESTAMENTARY TRUST, Derivatively on Behalf of Federal Home Loan Mortgage Corp.,

Plaintiff,

v.

RICHARD F. SYRON, ANTHONY PISZEL, EUGENE MCQUADE, MARTIN BAUMANN, BARBARA T. ALEXANDER, GEOFFREY T. BOISI, MICHELLE ENGLER, ROBERT R. GLAUBER, RICHARD KARL GOELTZ, SHAUN F. O'MALLEY, THOMAS S. JOHNSON, STEPHEN A. ROSS, WILLIAM M. LEWIS, JR., and NICOLAS P. RETSINAS,

Case No. 08-cv-5221-BSJ

Defendants,

- and -

FEDERAL HOME LOAN MORTGAGE CORPORATION,

Nominal Defendant.

**NOTICE OF PLAINTIFF
ESTHER SADOWSKY
TESTAMENTARY TRUST'S
CROSS-MOTION FOR
ENTRY OF PROPOSED
CASE MANAGEMENT
ORDER**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Opposition to Plaintiff Bassman's Motion to Consolidate Related Cases and for Entry of Proposed Case Management Order and in Support of its Cross-Motion for Entry of Proposed Case Management Order, the Declaration of Patrick K. Slyne in support thereof, and the exhibits attached thereto, plaintiff Esther Sadowsky Testamentary Trust will cross move this Court, before the Honorable James C. Francis IV, United States Magistrate Judge, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007, on a date to be determined by the Court, for the entry of [Proposed] Pre-Trial Order appointing Weiss & Lurie and Stull, Stull & Brody as co-Lead Counsel, and severing claims asserted in Count IX of the Bassman Complaint, Conspiracy to Deceive and Defraud by WaMu, First American, eAppraisIT, Country Wide and LSI, from Consolidated Actions.

Dated: August 25, 2008

Respectfully submitted,

WEISS & LURIE

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Plaintiff's Counsel